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Attorneys for Plaintiffs
TACSIS APC and KENT LIMSON

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TACSIS APC, a California corporation;
and KENT LIMSON, an individual,

Plaintiffs
v.

JACKIE ROBINSON, an individual; ALL
NET LAND DEVELOPMENT, LLC, a
Nevada Limited Liability Company; ALL
NET, LLC, a Nevada Limited Liability
Company; DRIBBLE DUNK, LLC, a
Nevada Limited Liability Company; AGS
ASSURETY, LLC, a Nevada Limited
Liability Company; TIMOTHY J.
ARELLANO, an individual; DAVID
LOWDEN, an individual; MESSNER
REEVES LLP, a Colorado Limited
Liability Partnership; TORBEN WELCH,
an individual; LORING JACOBS, an
individual, and DOES 1 THROUGH 100
INCLUSIVE,
Defendants.

Case No: 2:24-cv-02284-APG-EJY

**JOINT STIPULATION AND ORDER
STAYING DISCOVERY PENDING RULING
ON MOTIONS TO DISMISS**

Pursuant to L.R. 7-1, Plaintiffs and Defendants, by and through undersigned counsel, stipulate to stay all discovery in this action pending the Court's ruling on Defendants' Motions to Dismiss Plaintiffs' First Amended Complaint (ECF Nos. 100, 101, and 102), as set forth below.

RECITALS

WHEREAS, on September 2, 2025, Plaintiffs TACSIS APC and KENT LIMSON filed their First Amended Complaint (ECF No. 97).

WHEREAS, on September 12, 2025, Defendants MESSNER REEVES, LLP and TORBEN WELCH filed a Stipulation to Extend Time to Respond to Plaintiffs' First Amended Complaint, extending the time for all Defendants to respond by October 7, 2025, (ECF No. 98).

WHEREAS, on October 7, 2025, Defendants MESSNER REEVES, LLP, and TORBEN WELCH filed their Motion to Dismiss the First Amended Complaint (ECF No. 100).

WHEREAS, on October 7, 2025, Defendants LORING JACOBS; JACKIE ROBINSON; ALL NET, LLC; and DRIBBLE DUNK, LLC, filed their Motion to Dismiss the First Amended Complaint (ECF No. 101).

WHEREAS, on October 7, 2025, Defendants ALL NET LAND DEVELOPMENT, LLC, and DAVID LOWDEN filed their Motion to Dismiss the First Amended Complaint (ECF No. 102).

WHEREAS the parties have conferred and agreed that a stay of discovery pending the Court's ruling on Defendants' Motions to Dismiss the First Amended Complaint (ECF Nos. 100, 101, and 102) is appropriate and will conserve resources. *See Glass v. Global Widget, LLC*, 2020 U.S. Dist. LEXIS 32292, No. 2:19-cv-1906-MCE-KJN, *2 (E.D. Cal. Feb. 25, 2020) ("Without commenting on the merits of Defendant's motion, it is possible that all claims brought by Plaintiff could be dismissed with prejudice. Thus, a stay of discovery is in line with the principles of judicial economy and the Federal Rules of Civil Procedure.").

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THEREFORE, THE PARTIES HEREBY STIPULATE AS FOLLOWS:

1. All discovery in this action shall be stayed pending the Court's ruling on Defendants' Motions to Dismiss.

2. All parties will reconvene under Rule 26(f) within 21 days following the ruling on the last of the Motions (ECF Nos. 100, 101, and 102).

Respectfully submitted.

(Signatures to follow on Next Page)

DATED: December 5, 2025

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IT IS SO ORDERED.

DATED: _____

UNITED STATES DISTRICT JUDGE